

No. 15-10429-F

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

CREW ONE PRODUCTIONS, INC.,

Petitioner/Cross-Respondent,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent/Cross-Petitioner.

On Appeal from the National Labor Relations Board
Case Nos. 10-CA-138169 & 10-RC-124620

**JOINT MOTION OF ALL PARTIES FOR
AGREED BRIEFING SCHEDULE**

Under Fed. R. App. P. 31 and 11th Cir. R. 31-2, Petitioner/Cross-Respondent Crew One Productions, Inc. and Respondent/Cross-Petitioner National Labor Relations Board jointly and respectfully request that the Court enter the following agreed briefing schedule:

1. The initial appellant's brief of Crew One Productions, Inc. must be filed on or before May 20, 2015;
2. The appellee response brief of the National Labor Relations Board must be filed on or before June 24, 2015;
3. The reply brief of Crew One Productions, Inc. must be filed on or before July 10, 2015.

There is good cause for this joint request, which would extend the initial briefing schedule by two to three weeks and otherwise accommodate counsel. First, counsel for all parties have consulted and have agreed to the proposed briefing schedule. Second, Sarah E. Klapman, counsel for Crew One, has accepted a new job and is moving to withdraw from her representation of Crew One in this appeal. Third, the agreed briefing schedule accommodates all counsel with respect to their obligations concerning other pending actions, including an expected two-week jury trial in March/April 2015 for Crew One counsel Robert F. Parsley. Fourth, this request is timely, having been filed before the Clerk of Court's issuance of a notice of briefing schedule. Fifth, no prior request for extension of time has been made.

The parties respectfully request that the briefing schedule be entered or, alternatively, that other reasonable extensions of time be permitted.

Respectfully submitted,

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NATIONAL LABOR RELATIONS BOARD

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